

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

JOHN DOE,)
)
Plaintiff,)
)
vs.)
)
BROWN UNIVERSITY IN PROVIDENCE) Case No.: 2016-cv-17-S
IN THE STATE OF RHODE ISLAND AND)
PROVIDENCE PLANTATIONS,)
)
Defendant.)
)
_____)

STIPULATION

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, it is hereby stipulated by and between the parties as follows:

1. Brown University accepts service of the summons and complaint in this matter and shall have 60 days from the filing of this stipulation to answer the complaint.
2. John Doe's Motion for Injunctive Relief is withdrawn.
3. The January 5, 2016 letter to John Doe from Executive Vice President Russell C. Carey is rescinded. However, all existing no contact orders remain in effect. Maintenance and enforcement of the orders shall be in accordance with the Code of Student Conduct and the Sexual and Gender-Based Harassment, Sexual Violence, Relationship and Interpersonal Violence and Stalking Policy.
4. Pending resolution of the three complaints against him, Mr. Doe retains all of the rights and privileges guaranteed to members of the Brown University Community unless specifically denied in a no contact order or by the terms set forth herein. In accordance with these rights, Mr. Doe may, among other things:
 - a. Attend, make use of and enjoy all facilities and functions of the University subject to rules of general applicability to the University Community as a whole.

- b. Participate in all campus co-curricular events and activities and social functions, including but not limited to Brown Mock Trial.
- 5. In addition to the specific terms of the no contact orders, Mr. Doe's rights as a member of the University Community are limited as follows:
 - a. He may not reside on any floor of Olney House but the first floor. Mr. Doe shall endeavor to find another student who resides in a room on the first floor of Olney House to voluntarily exchange rooms with him. In the event Mr. Doe is unable to find such a student by February 5, 2016, Brown University shall assign Mr. Doe a room elsewhere on campus.
 - b. His presence at Olney House is restricted to the fraternity floors, which include floors one and two.
 - c. At Mock Trial team meetings, he shall seat himself on the opposite side of the room from his accusers in the pending complaints.
 - d. During any away Mock Trial competitions or events, he shall travel in a different vehicle, eat separately from, and overnight in a different hotel than his accusers in the pending complaints.
 - e. At social functions, including those of his fraternity and Mock Trial, Mr. Doe shall leave the function premises when he knows that one of his accusers is present, provided, however, that he shall have no obligation to leave his own residence hall room, and members of the Brown community may deny his accusers admission to social functions and gatherings that Mr. Doe plans to attend.
 - f. Mr. Doe shall refrain from contacting women on campus with whom he is unacquainted by letter or note or by any electronic or digital means, including but not limited to telephone, text, email, snapchat, Facebook, or Twitter.
- 6. The University states that the potential charges or policy violations at issue in the complaint of the student identified in this litigation as "Rae" are harassment in violation of Offense XIV of the 2015-2016 Code of Student Conduct and/or sexual or gender based harassment under para. VII-A of the Sexual and Gender-Based Harassment, Sexual Violence, Relationship and Interpersonal Violence and Stalking Policy.

Date: February 1, 2016

The Plaintiff, John Doe,
By his Attorney,

/s/ J. Richard Ratcliffe

J. Richard Ratcliffe, Esq. #2603
Jeffrey Biolchini, Esq. #7320
Ratcliffe Harten Burke & Galamaga, LLP
One Financial Plaza, 16th Floor
Providence, RI 02903
Tel: (401) 331-3400
Fax: (401) 331-3440
rratcliffe@rhbglaw.com
jbiolchini@rhbglaw.com

The Defendant, Brown University,
By its Attorneys,

/s/ James M. Green

James M. Green , Esq.
Michael D. Grabo, Esq.
Office of the General Counsel
Brown University, Box 1913
110 South Main Street
Providence, RI 02912
Tel: (401) 863-9977
Fax: (401) 863-1120
jmgreen@brown.edu
Michael_grabo@brown.edu